

STEPHEN R. KLEIN, *pro hac vice*  
Barr & Klein, PLLC  
1629 K St. NW, Ste. 300  
Washington, DC 20006  
Telephone: (202) 804-6676  
Email: [steve@barrklein.com](mailto:steve@barrklein.com)

Benjamin Barr, *pro hac vice*  
Barr & Klein, PLLC  
444 N. Michigan Ave., Ste. 1200  
Chicago, IL 60611  
Telephone: (202) 595-4671  
Email: [ben@barrklein.com](mailto:ben@barrklein.com)

Eric Winters #983790  
Eric C. Winters, Attorney  
30710 SW Magnolia Ave.  
Wilsonville, OR 97070  
Telephone: (503) 754-9096  
Email: [eric@ericwinters.com](mailto:eric@ericwinters.com)

Attorneys for Plaintiffs

ELLEN F. ROSENBLUM  
Attorney General  
BRIAN SIMMONDS MARSHALL #196129  
Senior Assistant Attorney General  
SHAUNEE MORGAN #194256  
Assistant Attorney General  
Department of Justice  
100 SW Market Street  
Portland, OR 97201  
Telephone: (971) 673-1880  
Fax: (971) 673-5000  
Email: [Brian.S.Marshall@doj.state.or.us](mailto:Brian.S.Marshall@doj.state.or.us)  
[Shaunee.Morgan@doj.state.or.us](mailto:Shaunee.Morgan@doj.state.or.us)

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

PROJECT VERITAS, PROJECT VERITAS  
ACTION FUND,

Plaintiffs,

v.

MICHAEL SCHMIDT, in his official capacity  
as Multnomah County District Attorney,  
ELLEN ROSENBLUM, in her official  
capacity as Oregon Attorney General,

Defendants.

Case No. 3:20-CV-01435-MO

JOINT MOTION TO AMEND  
SCHEDULING ORDER



Under Local Rule 16-3, the parties jointly move to amend the scheduling order to allow roughly 60 additional days for discovery and summary judgment briefing, as follows:

Close of Fact Discovery	February 28, 2022
Plaintiffs' Motion for Summary Judgment	March 21, 2022
Defendants' Combined Response and Motion	April 11, 2022
Plaintiffs' Combined Response and Reply	April 25, 2022
Defendants' Reply	May 9, 2022

The parties have served interrogatories, requests for production of documents, and requests for admission. They request this extension to ensure adequate time to complete discovery in light of counsel's trial schedules.

DATED November 19, 2021.

Respectfully submitted,

ELLEN F. ROSENBLUM  
Attorney General

s/ Stephen R. Klein  
STEPHEN R. KLEIN, *pro hac vice*  
Barr & Klein, PLLC  
1629 K St. NW, Ste. 300  
Washington, DC 20006  
Telephone: (202) 804-6676  
Email: [steve@barrklein.com](mailto:steve@barrklein.com)

Benjamin Barr, *pro hac vice*  
Barr & Klein, PLLC  
444 N. Michigan Ave., Ste. 1200  
Chicago, IL 60611  
Telephone: (202) 595-4671  
Email: [ben@barrklein.com](mailto:ben@barrklein.com)

Eric Winters #983790  
Eric C. Winters, Attorney  
30710 SW Magnolia Ave.  
Wilsonville, OR 97070  
Telephone: (503) 754-9096  
Email: [eric@ericwinters.com](mailto:eric@ericwinters.com)  
Of Attorneys for Plaintiffs

s/ Brian Simmonds Marshall  
BRIAN SIMMONDS MARSHALL #196129  
Senior Assistant Attorney General  
SHAUNEE MORGAN #194256  
Assistant Attorney General  
Trial Attorneys  
Tel (971) 673-1880  
Fax (971) 673-5000  
[Brian.S.Marshall@doj.state.or.us](mailto:Brian.S.Marshall@doj.state.or.us)  
[Shaunee.Morgan@doj.state.or.us](mailto:Shaunee.Morgan@doj.state.or.us)  
Of Attorneys for Defendants